

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
GREENEVILLE DIVISION**

**S.H., individually, and on behalf
of all others similarly situated,**

Plaintiffs,

v.

No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE,

Defendant.

_____ /

NOTICE OF ERRATA

Plaintiffs, by and through counsel, hereby submit this Notice of Errata to correct a clerical error in the Motion for Preliminary Approval of Class Action Settlement filed on May 19, 2025 (ECF 515).

In that motion, Plaintiffs' counsel incorrectly stated that they will seek reimbursement of litigation costs in an amount not to exceed \$20,000. *See id.* at 22. The correct amount is \$50,000. This amount is an estimated maximum for purposes of seeking preliminary approval. In their motion for attorneys' fees and costs, which would be filed concurrently with the motion for final approval, Plaintiffs' counsel will seek reimbursement only for costs actually incurred.

The correct costs figure does not affect any other terms of the settlement or the relief sought in the motion. If preliminary approval is granted, the notice to the Class will reflect the correct amount. Defendant City has been advised of the error and does not object to the filing of this Errata. Plaintiffs respectfully request that the Court consider this corrected amount in evaluating the motion.

Respectfully submitted,

Date: June 20, 2025

/s/ Elizabeth A. Kramer

Elizabeth A. Kramer (California Bar # 293129)

Julie C. Erickson (California Bar # 293111)

Kevin M. Osborne (California Bar #261367)

Pro Hac Vice

Erickson Kramer Osborne LLP

44 Tehama St.

San Francisco, CA 94105

415-635-0631

elizabeth@eko.law

julie@eko.law

kevin@eko.law

/s/ Heather Moore Collins

Heather Moore Collins (# 026099)

Ashley Shoemaker Walter (#037651)

HMC Civil Rights Law, PLLC

7000 Executive Center Dr., Suite 320

Brentwood, TN 37027

615-724-1996

615-691-7019 FAX

heather@hmccivilrights.com

ashley@hmccivilrights.com

/s/ Vanessa Baehr-Jones

Vanessa Baehr-Jones (California Bar # 281715)

Pro Hac Vice

Advocates for Survivors of Abuse PC

4200 Park Boulevard No. 413

Oakland, CA 94602

510-500-9634

vanessa@advocatesforsurvivors.com

Attorneys for Plaintiff and the Proposed Class

CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on June 20, 2025 to counsel of record:

K. Erickson Herrin
HERRIN, McPEAK & ASSOCIATES
515 East Unaka Avenue
P. O. Box 629
Johnson City, TN 37605-0629
erick@hbm-lawfirm.com
rachel@hbm-lawfirm.com

Emily C. Taylor
Maria Ashburn
WATSON, ROACH, BATSON &
LAUDERBACK, P.L.C.
P.O. Box 131
Knoxville, TN 37901-0131
etaylor@watsonroach.com
mashburn@watsonroach.com

Attorneys to Defendant Johnson City, Tennessee

Jonathan P. Lakey
Burch, Porter, & Johnson, PLLC
130 N. Court Ave.
Memphis, TN 38103
901-524-5000
jlakey@bpjlaw.com
mchrisman@bpjlaw.com

Attorney to Defendant City of Johnson City, Tennessee

/s/ Elizabeth A. Kramer
Elizabeth A. Kramer